# FACT SHEET HAZARDOUS WASTE MANAGEMENT STORAGE PERMIT USAARMC GARRISON AND FORT KNOX (FORT KNOX) 2949 FRAZIER ROAD

FORT KNOX, HARDIN COUNTY, KENTUCKY EPA I.D. #KY6-210-020-479 AI #: 1642

This fact sheet is prepared for the draft hazardous waste storage renewal permit which the Kentucky Energy and Environment Cabinet intends to reissue to U.S. Army Armor Center (USAARMC) Garrison and Fort Knox, (hereby after as Fort Knox) in Fort Knox, Kentucky, which has an issued EPA Identification Number KY6-210-020-479, Agency Interest Number 1642.

# I. Purpose of the Permitting Process

The purpose of the permitting process is to afford the Cabinet, interested citizens and other governmental agencies the opportunity to evaluate the ability of the Permittee (USAARMC and Fort Knox) to comply with applicable hazardous waste management regulations promulgated under the Kentucky Revised Statutes. The Cabinet is required to prepare a draft permit which sets forth in one concise document all the applicable requirements with which the permittee will be required to comply during the ten (10) year duration of the permit. The public is given forty-five (45) days to review the application and comment on the draft permit conditions prior to the Cabinet taking any final permitting action on the hazardous waste management permit. Public health, safety and environmental aspects of the proposal have been considered in the review of the application.

## II. Procedures for Reaching a Final Decision

The issuance of a hazardous waste renewal storage permit to USAARMC and Fort Knox is to be coordinated by the Kentucky Energy and Environment Protection Cabinet.

Any person interesting in commenting on this decision must do so within the forty five (45) day comment period. Title 401 Kentucky Administrative Regulations chapter 38 requires that the public be given a forty-five (45) day comment period for each permit prepared under Kentucky Revised Statutes. The comment period begins on May 27, 2009, coincident with the date of the publication of the public notice in The Courier-Journal and ends on July 10, 2009. Anyone wishing to submit a comment on or before midnight of July 10, 2009, 45 days after the public comment period begins, needing additional information, or wanting to be put on the facility mailing list should send electronic comments to Kelly Neal at <a href="kelly.neal@ky.gov">kelly.neal@ky.gov</a> or mail April Webb, P.E., Branch Manager, Division of Waste Management, Hazardous Waste Branch, 200 Fair Oaks Lane, Frankfort KY 40601. The administrative record, which includes the permit and related information, can be reviewed at two locations:

#### **Barr Library**

Point of Contact: Cindy Arnold 62 Quartermaster Street Fort Knox, KY 40121 Phone: (502) 624-INFO (4636) Hours of Operation:

Mon. – Th. 11 AM - 8 PM Fri. - Sat 11 AM - 6 PM

Sunday & Federal Holidays Closed

#### **Division of Waste Management**

200 Fair Oaks Lane Frankfort, KY 40601 **By Appointment** 

Point of Contact: Tina Fisher

Phone: (502) 564-6716 Fax: (502) 564-9232

Email: tina.fisher@kv.gov

Hours of Operation: Mon.-Fri. 8:30 AM - 4:00 PM

The Cabinet will consider all comments received during the comment period in formulating a decision on issuance of the permit regardless of the holding of a hearing. The Division has tentatively scheduled a public hearing for June 30, 2009 at Colvin Community Center (close to the Wilson Gate) on 230 Freedoms Way, Ridcliff, KY. If the Division does not receive significant comments June 25, 2009, the Division will cancel the tentative hearing. After consideration of all oral and written comments and requirements of the Resource Conservation and Recovery Act, Kentucky Revised Statutes and appropriate regulations, the Secretary of the Energy and Environment Cabinet will make the decision regarding the permit issuance. If the tentative decision to issue a permit is substantially changed, the Cabinet will issue a public notice indicating a revision of decision. If the tentative decision to issue a permit is substantially unchanged from those announced in the public notice, notification will be given to the applicant and each person, who has submitted comments or has requested notice of the final permit decision.

### **III. Facility Description**

The Kentucky energy and Environment Cabinet, Division of Waste Management, intends to issue a hazardous waste storage renewal permit to USAARMC and Fort Knox, in Fort Knox, Kentucky to continue operating a hazardous waste storage facility. This facility is permitted to store ignitable, corrosive, reactive, and toxic waste in containers. The permit includes five storage bays with a maximum combined capacity of 6,800 gallons. The only hazardous wastes which may be stored at this facility are generated on-site at USAARMC and Fort Knox and are listed below:

EPA Code	Waste Description
	Hazardous Waste Characteristic
D001	Ignitable waste
D002	Corrosive waste
D003	Reactive waste
D004	Arsenic
D005	Barium
D006	Cadmium
D007	Chromium
D008	Lead
D009	Mercury
D010	Selenium
D011	Silver
D012	Endrin(1,2,3,4,10,10-hexachloro-1,7-epoxy-1,4,4a,5,6,7,8,8a-octahydro-1,4-endo, endo-5,8-dimeth-ano-naphthalene)
D013	Lindane (1,2,3,4,5,6-hexa-chlorocyclohexane, gamma isomer)
D014	Methoxychlor (1,1,1-trichloro-2,2-bis [p-methoxyphenyl] ethane)
D015	Toxaphene (C10 H10 Cl8, Technical chlorinated camphene, 67-69 percent chlorine)
D016	2,4-D (2,4-Dichlorophenoxyacetic acid)
D017	2,4,5-TP Silvex (2,4,5-Trichlorophenoxypropionic acid)
D018	Benzene
D019	Carbon tetrachloride
D020	Chlordane
D021	Chlorobenzene
D022	Chloroform
D023	o-Cresol
D024	m-Cresol

EDA			
EPA Code	Waste Description		
D025	p-Cresol		
D026	Cresol		
D027	1,4-Dichlorobenzene		
D028	1,2-Dichloroethane		
D029	1,1-Dichloroethylene		
D030	2,4-Dinitrotoluene		
D031	Heptachlor (and its epoxide)		
D032	Hexachlorobenzene		
D033	Hexachlorobutadiene		
D034	Hexachloroethane		
D035	Methyl ethyl ketone		
D036	Nitrobenzene		
D037	Pentachlorophenol		
D038	Pyridine		
D039	Tetrachloroethylene		
D040	Trichlorethylene		
D041	2,4,5-Trichlorophenol		
D042	2,4,6-Trichlorophenol		
D043	Vinyl chloride		
	Hazardous Waste From Nonspecific Sources		
F001	The following spent halogenated solvents used in degreasing:		
	Tetrachloroethylene, trichlorethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.		
F002	The following spent halogenated solvents: Tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho- dichlorobenzene, trichlorofluoromethane, and 1,1,2, trichloroethane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F001, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.		
F003	The following spent non-halogenated solvents: Xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; all spent solvent mixtures/ blends containing, before use, only the above spent nonhalogenated solvents; and all spent solvent mixtures/blends containing, before use, one or more of the above nonhalogenated solvents, and a total of ten percent or more (by volume) of one or more of those solvents listed in F001, F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.		
F004	The following spent nonhalogenated solvents: cresols, cresylic acid, and nitrobenzene; and the still bottoms from the recovery of these solvents; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above nonhalogenated solvents or those solvents listed in F001, F002, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.  The following spent nonhalogenated solvents: toluene, methyl ethyl ketone,		
	carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and 2-		

EDA-	
EPA Code	Waste Description
	nitropropane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above nonhalogenated solvents or those solvents listed in F001, F002, or F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F027	Discarded unused formulations containing tri-, tetra-, or penta- chlorophenol or discarded unused formulations containing compounds derived from these chlorophenols. (This listing does not include formulations containing hexachlorophene synthesized from prepurified 2,4,5-trichlorophenol as the sole component.)
F001	The following spent halogenated solvents used in degreasing: Tetrachloroethylene, trichlorethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F002	The following spent halogenated solvents: Tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho- dichlorobenzene, trichlorofluoromethane, and 1,1,2, trichloroethane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F001, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F003	The following spent non-halogenated solvents: Xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; all spent solvent mixtures/ blends containing, before use, only the above spent nonhalogenated solvents; and all spent solvent mixtures/blends containing, before use, one or more of the above nonhalogenated solvents, and a total of ten percent or more (by volume) of one or more of those solvents listed in F001, F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F004	The following spent nonhalogenated solvents: cresols, cresylic acid, and nitrobenzene; and the still bottoms from the recovery of these solvents; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above nonhalogenated solvents or those solvents listed in F001, F002, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
	Discarded Commercial Chemical Products, Off-Specification Species, Container Residuals, And Spill Residues There Of
	* Acute Hazardous Waste *
P001	2H-1-Benzopyran-2-one, 4-hydroxy-3-(3-oxo-1-phenylbutyl)-, & salts, when present at concentrations greater than 0.3%
P030	Cyanides (soluble cyanide salts), not otherwise specified
P031	Cyanogen
P037	Dieldrin
P037	2,7:3,6-Dimethanonaphth[2,3-b]oxirene,3,4,5,6,9,9-hexachloro- 1a,2,2a,3,6,6a,7,7a-octahydro-, (1alpha,2beta, 2alpha,3beta,6beta,6alpha,7beta, 7alpha)-
P043	Phosphorofluoridic acid, bis(1-methylethyl) ester
P044	Dimethoate
P098	Potassium cyanide

EPA	West Bassach
Code	Waste Description
P123	Toxaphene
P001	2H-1-Benzopyran-2-one, 4-hydroxy-3-(3-oxo-1-phenylbutyl)-, & salts, when
	present at concentrations greater than 0.3%
	Discarded Commercial Chemical Products, Off-Specification Species,
	Container Residues, And Spill Residues Thereof
	Toxic Wastes
U002	Acetone (I)
U019	Benzene (I,T)
U020	Benzenesulfonic acid chloride (C,R)
U036	Chlordane, alpha & gamma isomers
U037	Benzene, chloro-
U041	Epichlorohydrin
U043	Ethene, chloro-
U044	Chloroform
U052	Cresol (Cresylic acid)
U057	Cyclohexanone (I)
U058	Cyclophosphamide
U069	1,2-Benzenedicarboxylic acid, dibutyl ester
U070	Benzene, 1,2-dichloro-
U072	Benzene, 1,4-dichloro-
U075	Dichlorodifluoromethane
U076	Ethane, 1,1-dichloro-
U077	Ethane, 1,2-dichloro-
U078	1,1-Dichloroethylene
U080	Methane, dichloro-
U088	1,2-Benzenedicarboxylic acid, diethyl ester
U103	Dimethyl sulfate
U105	Benzene, 1-methyl-2,4-dinitro-
U121	Methane, trichlorofluoro-
U122	Formaldehyde
U127	Benzene, hexachloro-
U127	Hexachlorobenzene
U128	Hexachlorobutadiene
U129	Cyclohexane, 1,2,3,4,5,6-hexa-chloro-, (1alpha,
	2alpha,3beta,4alpha,5alpha,6beta)-
U131	Hexachloroethane

# IV. Permit Organization

The permit is divided into eight parts:

- Part I sets forth the basic legal authority for issuing the permit;
- Part II contains the conditions that are specifically applicable to this particular facility;
- Part III contains standard conditions applicable to all hazardous waste management facilities;
- Part IV contains corrective action requirements for this facility;

- Part V contains waste minimization;
- Part VI contains land disposal restrictions;
- Part VII contains RCRA organic air emission requirements; and
- Part VIII contains referenced attachments.

Below is a list of the Specific Conditions (**Part II**) set forth by the permit with which the facility must comply. The conditions, in the opinion of the Cabinet, will ensure compliance with hazardous waste management regulations more specifically and are listed by subject matter and the referenced Title 401 of Kentucky Administrative Regulation (KARs).

Permit Condition Location	PART II PEMIT CONDITIONS Condition Title	Regulation Cite 401 KAR
II.B.	GENERAL FACILITY STANDARDS	
II.B.1.	General Waste Analysis	34:020, Section 4
II.B.2.	Security	34:020, Section 5
II.B.3.	General Inspection Requirements	34:020, Section 6
II.B.4.	Personnel Training	34:020, Section 7'
II.B.5.	Requirements for Ignitable, Reactive, or Incompatible Wastes	34:020, Section 8
II.0	PREPAREDNESS AND PREVENTION	
II.C.1.	Design and Operation of Facility	34:030, Section 2
II.C.2.	Equipment Required	34:030, Section 3
II.C.3.	Testing and Maintenance of Equipment	34:030, Section 4
II.C.4.	Access to Communications or Alarm System	34:030, Section 5
II.C.5.	Required Aisle Space	34:030, Section 6
II.C.6.	Arrangements with Local Authorities	34:030, Section 7
II.D.	CONTINGENCY PLAN AND EMERGENCY PREPAREDNESS PLAN	
II.D.1	Implementation of Contingency Plan	34:040, Section 2
II.D.2.	Copies of the Contingency Plan	34:040, Section 4
II.D.3.	Amendment of Contingency Plan	34:040, Section 5
II.D.4.	Emergency Coordinator	34:040, Section 6
II.D.5.	Emergency Procedure	34:040, Section 7
II.D.6.	Notation in the Operating Record	34:040, Section 3
II.D.7.	Notification to the Cabinet	34:040, Section 7
II.E.	MANIFEST SYSTEM	34:050, Section 2, 3
II.E.1.	Use of the Manifest	38:030, Section 1
II.E.2.	Manifest Discrepancy Report	34:050, Section 4
II.F.	RECORDKEEPING AND REPOR TING	34:050, Section 5
II. F.1.	Operating Record	34:050, Section 6
II.F.2.	Availability, Retention and Disposition of Records	34:050, Section 8
II.F.3.	Annual Report	34:070, Section 2
II.F.4.	Additional Reports	34:180, Section 9
II.G.	CLOSURE	
II.G.1.	Closure Performance Standards	34:190, Section 8
II.G.2.	Notification of Closure	34:070, Section 3(4)
ILG.3.	Closure Plan and Amendment of Closure Plan	34:070, Section 3
II.G.4.	Time Allowed for Closure	34:070, Section 4
II.G.5.	Disposal or Decontamination of Equipment, Structure s and Soils	34:070, Section 5
II.G.6.	Certification of Closure	34:070, Section 6
II.H.	CONTAINER MANAGEMENT PRACTICES	/
II.H.1.	General Conditions	34:180, Section 1

Permit Condition Location	PART II PEMIT CONDITIONS Condition Title	Regulation Cite 401 KAR
II.H.2.	Condition of Containers	34:180, Section 2
II.H.3.	Compatibility of Waste with Containers	34:180, Sections 4 & 5
II.H.4.	Management of Containers	34:180, Section 6
II.H.5.	Containment	34:180, Section 7
II.H.6.	Special Requirements for Ignitable or Reactive Wastes	34:180, Section 8
II.H.7.	Special Requirements for Incompatible Wastes	34:180, Section 3
II.H.8.	Special Requirements for Restricted Waste	Chapter 37

**Part III** of the permit sets forth the standard procedural conditions that are applicable to all hazardous waste management facilities. As in the previous section, the conditions are listed by the subject with the referenced regulations from Title 401 of the Kentucky Administrative Regulations (KARs).

PERMIT CONDITION LOCATION	PART III PEMIT STANDARD CONDITIONS  Condition Title	Regulation Cite 401 KAR
III.A.	EFFECT OF PERMIT	38:010, Section 3 38:080, Section 1
III.B.	PERMIT ACTIONS	38:030, Section 1 38:040 38:050 38:060 38:070 40:040, Section 1
III.B.1.	Permit Modification	38:040, Section 3 34:060, Section 12
III.B.2.	Permit Modification, Revocation and Reissuance, and Termination	38:030, Sections 1 38:040, Sections 1, 2, 3, and 4 38:050, Section 2 40:040, Section 1
III.B.3.	Permit Renewal	38:030 Section 1 38:040 38:050 38:070
III.B.4.	Permit Expiration	38:070 Section 5 38:080-310
III.C.	SEVERABILITY	30:020, Section 5
III.D.	DEFINITIONS	Chapters 30, 34, 38
III.E.	DUTIES AND REQUIREMENTS	
III.E.1.	Duty to Comply	38:030, Section 1
III.E.2.	Duty to Reapply	38:030, Section 1 38:040 38:050 38:070
III.E.3.	Permit Expiration	38:040, Section 6
III.E.4.	Obligation for Corrective Action	34:060 Section 12 38:010 Section 1

PERMIT CONDITION LOCATION	PART III PEMIT STANDARD CONDITIONS  Condition Title	Regulation Cite 401 KAR
		38:040 Section 6
III.E.5.	Need to Halt or Reduce Activity Not a Defense	38:030, Section 1
III.E.6.	Duty to Mitigate	38:030, Section 1
III.E.7.	Proper Operation and Maintenance	38:030, Section 1
III.E.8.	Duty to Provide Information	38:030, Section 1
III.E.9.	Inspection and Entry	38:030, Section 1
		38:030, Section 1
III.E.10.	Monitoring and Records	34:050, Section 4
		31:120
III.E.11.	Reporting Planned Changes	38:030, Section 1
III.E.12.	Anticipated Non-Compliance	38:030, Section 1
III.E.13.	Certification or Construction Modification	000000000000000000000000000000000000000
		38:020, Section 3
III = 4.4	T (D )	38:030, Section 1
III.E.14.	Transfer of Permit	38:040, Section 1
		38:040, Section 2
III.E.15.	Compliance Cahadula	38:050, Section 2
III.E.15.	Compliance Schedule	38:030, Section 1 38:030, Section 1
III. E.17.	Two-Hour Reporting Other Non-Compliance	38:030, Section 1
	Other Non-Compliance	38:040, Section 3
III.E.18.	Permit Modification	34:060, Section 12
III.E.19.	Other Information	38:030, Section 1
		38:070, Section 7
III.E.20.	Signatory Requirements	38:030, Section 1
III.E.21.	Amendment of Part A Application	
III.F.	CHANGES TO PERMIT	38:040, Section 2
III.F.1.	Additions or Alterations	38:040, Section 2
III.F.2.	New Information	38:040, Section 2
III.F.3.	New Statutes, Standards, or Administrative Regulations	38:040, Section 2
III.G.	DOCUMENTS TO BE MAINTAINED AT FACILITY	34:020, Section 7 34:040, Section 4 34:050, Section 2 34:050, Section 3 34:050, Section 4 34:050, Section 5 34:050, Section 6 34:050, Section 7 34:180 34:190, Section 4
III.G.1.	Permit	Chapters 34 & 38
III.G.2.	Permit Application	38:070-09
III.G.3.		38:150-310
	Waste Analyses Plan	34:020 Section 4
III.G.4.	Closure Plan	34:070 Section 3
III.G.5.	Annually-adjusted cost estimate for facility closure	34:090 Section 1
III.G.6.	Operating Record	34:050 Section 4
III.G.7.	Personnel Training Documents And Records	34:020 Section 7
III.G.8.	Container Management Practice	34:180 34:020 Section 6
III.G.10. III.G.12.	Inspection Schedules	
III.G. IZ.	Contingency Plan	34:040 Section 4

PERMIT CONDITION LOCATION	PART III PEMIT STANDARD CONDITIONS  Condition Title	Regulation Cite 401 KAR
III.G.13.	All Other Documents	34:060
III.H.	CONFIDENTIAL INFORMATION	38:070, Section 8
III I.	PERMIT CONDITIONS AND ATTACHMENTS	Chapters 34 & 38
III.L.	CROSS REFERENCES OF KARS AS GOVERN BY CFRs	Chapters 34 & 38

**PART IV** of the permit sets forth the conditions that are applicable to Corrective Action. As in the previous section, the conditions are listed by the subject with the referenced regulations from Title 401 of the Kentucky Administrative Regulations (KARs).

A 1992 RCRA Facility Assessment (RFA) identified a number of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). Past installation practices included the storage and handling of hazardous wastes along with incidental spills and leaks. As a result of these practices, releases of contaminants to soil and groundwater have occurred at the site. Environmental investigations at the facility confirmed the presence of those various contaminants within the soils. Those investigations also provided the data for determining the types of contaminants present, and the horizontal and vertical extent of those contaminants within both the soil and groundwater.

Previously identified contaminants are being remediated at an accelerated pace. This affects the present day status of various SWMUs and AOCs. A majority of the remediation's are considered complete and no further action (NFA) will be required. Some corrective action solutions will involve land use controls (LUC/LTM) and long term monitoring. Some of the LUC/LTM's are presently in place, and some have been agreed to in principle. All land use controls and long-term monitoring plans will be structured prior to approval of each final corrective action remedy.

Included in the Fort Knox Part B Permit Application submission, is a modification to Appendix A-1 and A-2, and deletion of Appendix A-3. Prior to this modification the SWMUs were handled in groups. Due to the maturity of the ongoing corrective action activity at the site the SWMUs are currently evaluated and remediated on a SWMUs-by-SWMUS basis. The proposed modification will add clarity to the status of SWMUs at the facility.

PERMIT CONDITION LOCATION	PART OF THE PEMIT Condition Title	Regulation Cite 401 KAR
PART IV	CORRECTIVE ACTION	34:060
IV.A.1.	SWMUs and AOCs Identified by the RFA Requiring Further Action	34:060
IV.A.2.	SWMUs or AOCs Requiring No Further Action	34:060
IV.A.3.	SWMUs and AOCs and Institutional Controls	34:060
IV.A.4.	Additional SWMUs or AOCs	34:060
IV.A.5.	Contamination Beyond Facility Boundary	34:060
IV.B.1.	Notification	34:060
IV.B.2.	Assessment Report	34:060
IV.B.3.	Determination	34:060
IV.C.1.	Notification	34:060
IV.C.2.	Plan for Further Investigation	34:060

PERMIT CONDITION LOCATION	PART OF THE PEMIT Condition Title	Regulation Cite 401 KAR
IV.D.1.	CS Work Plan	34:060
IV.D.2.	Approval Required	34:060
IV.D.3.	Implementation	34:060
IV.D.4.	Confirmatory Sampling Report	34:060
IV.D.5.	Further Action Determination	34:060
IV.E.1.	RFI Work Plan(s)	34:060
IV.E.2	RFI Work Plan for Newly Identified SWMUs and AOCs	34:060
IV.E.3.	Required Contents	34:060
IV.E.4.	Further Investigation Determination	34:060
IV.E.5.	Dye Trace Studies	34:060
IV.E.6.	RFI Implementation	34:060
IV.E.7.	RFI Progress Reports	34:060
IV.E.7.	RFI Report	34:060
IV.E.8.	Further Investigation Notification	34:060
IV.F.1.	IM Work Plan	34:060
IV.F.2.	IM Implementation	34:060
IV.F.3.	IM Reports	34:060
IV.G.1.	Corrective Measures Study (CMS) Work Plan	34:060
IV.G.2.	Corrective Measures Study Implementation	34:060
IV.G.3.	CMS Report	34:060
IV.H.1.	Remedy Selection	34:060
IV.H.2.	Statement of Basis	34:060
IV.H.3.	Permit Modification	34:060
IV.I.	CORRECTIVE MEASURES IMPLEMENTATION (CMI)	34:060
IV.I.1.	CMI Work Plan	34:060
IV.I.2.	Operation and Maintenance Plan	34:060
IV.I.3.	Approval	34:060
IV.I.4.	Construction Completion Report	34:060
IV.I.5.	Remedy with Land Use Controls	34:060
IV.I.6.	CMI Progress Reports	34:060
IV.I.7.	Remedy Completion Report	34:060
IV.J.	MODIFICATION OF THE CORRECTIVE ACTION SCHEDULE OF COMPLIANCE	34:060
IV.J.1.	Modifications to Corrective Action Schedule	34:060
IV.K.	IMMINENT HAZARDS	34:060
IV.K.1.	Reporting Requirements	34:060
IV.K.2.	Reporting Timeline	34:060
IV.L.	WORK PLAN AND REPORT REQUIREMENTS	34:060
IV.L.1.	Approval	34:060
IV.L.2.	Schedule	34:060
IV.L.3.	Amended Work Plans	34:060
IV.L.4.	Signature/Certification	34:060
IV.L.5.	Deliverables	34:060
IV.M.	APPROVAL/DISAPPROVAL OF SUBMITTALS	34:060
IV.N.	CROSS REFERENCES OF KARS AS GOVERNED BY CFRS	<b>Chapters 34 &amp; 38</b>

**PART V** of the permit sets forth the standard procedural conditions that are applicable to the Waste Minimization. As in the previous section, the conditions are listed by the subject with the referenced regulations from Title 401 of the Kentucky Administrative Regulations (KARs).

PERMIT CONDITION LOCATION	PART OF THE PEMIT Condition Title	Regulation Cite 401 KAR
PART V	WASTE MINIMIZATION	34:050, Section 4
V.A.	GENERAL RESTRICTIONS	34:050, Section 4
V.B.	RECORDING REQUIREMENTS	34:050, Section 4
V.C.	WASTE MINIMIZATION OBJECTIVES	34:050, Section 4
V.C.1.	Top Management Support	34:050, Section 4
V.C.2.	Characterization of Waste Generation	34:050, Section 4
V.C.3.	Periodic Waste Minimization Assessments	34:050, Section 4
V.C.4.	Cost Allocation System	34:050, Section 4
V.C.5.	Technology Transfer	34:050, Section 4
V.C.6.	Program Evaluation	34:050, Section 4
V.D.	CROSS REFERENCES OF KARS AS GOVERNED BY CFRs	

**PART VI** of the permit sets forth the conditions that are applicable to all hazardous waste and their Land Disposal Restrictions. As in the previous section, the conditions are listed by the subject with the referenced regulations from Title 401 of the Kentucky Administrative Regulations (KARs).

PERMIT CONDITION LOCATION	PART OF THE PEMIT Condition Title	Regulation Cite 401 KAR
PART VI	LAND DISPOSAL RESTRICTIONS	Chapter 37
VI.A.	GENERAL RESTRICTIONS	Chapter 37
VI.B.	LAND DISPOSAL PROHIBITIONS AND TREATMENT STANDARDS	Chapter 37

**PART VII** of the permit sets forth the standard procedural conditions that are applicable to all hazardous waste management facilities. As in the previous section, the conditions are listed by the subject with the referenced regulations from Title 401 of the Kentucky Administrative Regulations.

PERMIT CONDITION LOCATION	PART OF THE PEMIT Condition Title	Regulation Cite 401 KAR
PART VII	RCRA ORGANIC AIR EMISSION REQUIREMENTS	34:275 34:280 34:281
VII.A.	INTRODUCTION AND APPLICABILITY	34:275 34:280 34:281
VII.A.1.	Air Emission Standards For Process Vents (Subpart AA)	34:275
VII.A.3.	Air Emissions Standards From Leaks From Specific	34:280

PERMIT CONDITION LOCATION	PART OF THE PEMIT Condition Title	Regulation Cite 401 KAR
	Equipment (Subpart BB)	
VII.A.4.	Air Emission Standards For For Tanks, Surface Impoundments, Containers & Miscellaneous Units (Subpart CC)	34:281
VII.B.	EMISSION CONTROL TECHNOLOGY	34:275
		34:280
		34:281
VII.C.	GENERAL STANDARDS	34:275
		34:280
		34:281
	REPORTING REQUIREMENTS	34:275
VII.D.		34:280
		34:281
VII.E.	NOTIFICATION OF NEW UNITS	34:275
		34:280
		34:281
VII.F.	CROSS REFERENCES OF KARS AS GOVERNED BY CFRS	34:275
		34:280
	UFNO	34:281

**PART VIII** of the permit contains the incorporated sections and attachments (ATTACHMENTS A-J) submitted by the facility as part of their permit application. The appendices are additional and supplemental documentation to the Permit, Part I though Part VII. As in the previous section, the conditions are listed by the subject with the referenced regulations from Title 401 of the Kentucky Administrative Regulations.

PERMIT CONDITION LOCATION	PART OF THE PEMIT Condition Title <sup>1</sup>	Permit Application Cross Reference <sup>2</sup>
PART VIII	REFERENCED ATTACHMENTS	
ATTACHMENT A	PART A APPLICATION	PART A APPLICATION
ATTACHMENT B	FACILITY DESCRIPTION	SECTION B
ATTACHMENT C	WASTE CHARACTERISTICS	SECTION C ATTACHMENT I
ATTACHMENT D	PROCESS INFORMATION	SECTION D ATTACHMENT IV
ATTACHMENT E	GROUNDWATER MONITORING AND	PART IV
ATTACHMENT F	CONTINGENCY PLAN	SECTION F ATTACHMENT II
ATTACHMENT G	PERSONNEL TRAINING	SECTION G ATTACHMENT V
ATTACHMENT H	CLOSURE PLANS	SECTION H ATTACHMENT III
ATTACHMENT I	POST-CLOSURE PLANS, FINANCIAL REQUIREMENTS	SECTION I ATTACHMENT VI
ATTACHMENT J	MISCELLANEOUS REQUIREMENTS	PART J
APPENDIX A-1	List Of SWMUs That Require No Further Investigation	PART IV
APPENDIX A-2	List Of SWMUs That Require Land Us1e Controls	PART IV

PERMIT CONDITION LOCATION	PART OF THE PEMIT  Condition Title <sup>1</sup>	Permit Application Cross Reference <sup>2</sup>
APPENDIX A-3	RCRA Facility Investigation (RFI) – Work Plan Outline	PART IV
APPENDIX B	Corrective Measure Study (CMS) Outline	PART IV
APPENDIX C	Corrective Action Schedule Of Compliance	PART IV
APPENDIX D	Screening Levels	PART IV
APPENDIX E	Long Term Monitoring Plan	PART IV
APPENDIX F	Summary Of Container Management Units Subject To Subpart CC	PART IV
APPENDIX G	Subpart CC Standard Compliance Methods	PART VII
APPENDIX H	List Of SWMUs That Require No Further Investigation	PART VII

<sup>&</sup>lt;sup>1</sup> Selected sections, parts, attachments submitted as part of the Permittee's Permit Application have been incorporated into the Permit as Permit Attachments. However, this does not indicate that the Permit Application may be used as a substitute for the Permit Attachment prepared by the Division.

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<sup>&</sup>lt;sup>2</sup> Part A and Part B Permit Application was submitted to the Division on September 21, 2007 and determined complete on September 29, 2008.